

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION**

IN RE:	CASE NO. 19-00730-5-JNC
CAH ACQUISITION COMPANY #1, LLC, d/b/a WASHINGTON COUNTY HOSPITAL, <sup>1</sup>	CHAPTER 11
Debtor,	(Jointly Administered)
IN RE:	CASE NO. 19-01230-5-JNC
CAH ACQUISITION COMPANY #2, LLC, d/b/a OSWEGO COMMUNITY HOSPITAL,	CHAPTER 11
Debtor,	(Jointly Administered)
IN RE:	CASE NO. 19-01180-5-JNC
CAH ACQUISITION COMPANY #3, LLC, d/b/a HORTON COMMUNITY HOSPITAL,	CHAPTER 11
Debtor,	(Jointly Administered)
IN RE:	CASE NO. 19-01300-5-JNC
CAH ACQUISITION COMPANY 6, LLC, d/b/a I-70 COMMUNITY HOSPITAL,	CHAPTER 7
Debtor,	(Jointly Administered)
IN RE:	CASE NO. 19-01298-5-JNC
CAH ACQUISITION COMPANY 7, LLC, d/b/a PRAGUE COMMUNITY HOSPITAL,	CHAPTER 11
Debtor,	(Jointly Administered)
IN RE:	CASE NO. 19-01697-5-JNC
CAH ACQUISITION COMPANY 12, LLC, d/b/a FAIRFAX COMMUNITY HOSPITAL,	CHAPTER 11
Debtor,	(Jointly Administered)

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<sup>1</sup> The Court has entered orders directing the procedural consolidation and joint administration of the debtors' cases.

IN RE:

CAH ACQUISITION COMPANY 16, LLC, d/b/a  
HASKELL COUNTY COMMUNITY HOSPITAL,

Debtor,

THOMAS W. WALDREP, JR., as Litigation Trustee,

Plaintiff,

v.

REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB  
OUTREACH, LLC, and MICHAEL REECE,

Defendants.

CASE NO. 19-01227-5-JNC

CHAPTER 11

(Jointly Administered)

A.P. Nos. 22-00101-5-JNC, et al.

**CONSENT MOTION FOR WITHDRAWAL OF SPECIAL APPEARANCE**  
**BY ERIC JAY LANGSTON**

Now comes Eric Jay Langston with the law firm of AEGIS LAW and seeks an order authorizing him to withdraw his special appearance as counsel for and on behalf of Defendants Reboot, Inc., D/B/A HIPPA A Guard, Rural Lab Outreach, LLC, and Michael Reece (“Defendants”). James S. Livermon, III of the law firm Womble Bond Dickinson (US) LLC, who currently serve as Local Civil Rule 83.1(d) Counsel for Defendants, has agreed to assume the role as lead counsel for the Defendants. Defendants’ counsel have met and conferred with Plaintiffs’ counsel about this Motion and Plaintiffs consent to the Motion. A copy of the proposed Order Withdrawing Special Appearance by Eric Jay Langston is attached as “**Exhibit A**”.

Mr. Livermon is aware of and will comply with all pending deadlines in the case, including all scheduled trials and hearings.

Wherefore, Mr. Langston respectfully requests this Court to allow him to withdraw his special appearance on behalf of the Defendants.

Respectfully submitted this 29<sup>th</sup> day of August, 2023.

**AEGIS LAW**

/s/ Eric Jay Langston  
Eric Jay Langston  
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and

/s/ James S. Livermon III  
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Email: Charlie.Livermon@wbd-us.com

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I, the undersigned, or Womble Bond Dickinson (US) LLP certifies:

That I am, at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on this day, I served a copy of the foregoing Consent Motion for Withdrawal of Special Appearance by Eric Jay Langston on;

Micah E. Marcus  
McDonald Hopkins LLC  
300 N. LaSalle, Suite 1400  
Chicago, IL 60654

Thomas W. Waldrep, Jr.  
James C. Lanik  
Waldrep Wall Babcock & Bailey PLLC  
370 Knollwood Street, Suite 600  
Winston-Salem, NC 27103

by depositing a copy thereof in the United States Mail, First Class, postage prepaid.

That on this day, the foregoing Consent Motion for Withdrawal of Special Appearance by Eric Jay Langston was served by electronic means through the court's CM/ECF service on:

Micah E. Marcus  
Thomas W. Waldrep, Jr.  
James C. Lanik  
Attorneys for Plaintiff

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 29, 2023

**WOMBLE BOND DICKINSON (US) LLP**

By: /s/ James S. Livermon, III  
James S. Livermon, III

*Counsel for Defendants*

**EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION**

IN RE:  CAH ACQUISITION COMPANY #1, LLC, d/b/a WASHINGTON COUNTY HOSPITAL, <sup>1</sup>  Debtor,	CASE NO. 19-00730-5-JNC  CHAPTER 11  (Jointly Administered)
IN RE:  CAH ACQUISITION COMPANY #2, LLC, d/b/a OSWEGO COMMUNITY HOSPITAL,  Debtor,	CASE NO. 19-01230-5-JNC  CHAPTER 11  (Jointly Administered)
IN RE:  CAH ACQUISITION COMPANY #3, LLC, d/b/a HORTON COMMUNITY HOSPITAL,  Debtor,	CASE NO. 19-01180-5-JNC  CHAPTER 11  (Jointly Administered)
IN RE:  CAH ACQUISITION COMPANY 6, LLC, d/b/a I-70 COMMUNITY HOSPITAL,  Debtor,	CASE NO. 19-01300-5-JNC  CHAPTER 7  (Jointly Administered)

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<sup>1</sup> The Court has entered orders directing the procedural consolidation and joint administration of the debtors' cases.

IN RE:  CAH ACQUISITION COMPANY 7, LLC, d/b/a PRAGUE COMMUNITY HOSPITAL,  Debtor,	CASE NO. 19-01298-5-JNC  CHAPTER 11  (Jointly Administered)
IN RE:  CAH ACQUISITION COMPANY 12, LLC, d/b/a FAIRFAX COMMUNITY HOSPITAL,  Debtor,	CASE NO. 19-01697-5-JNC  CHAPTER 11  (Jointly Administered)
IN RE:  CAH ACQUISITION COMPANY 16, LLC, d/b/a HASKELL COUNTY COMMUNITY HOSPITAL,  Debtor,	CASE NO. 19-01227-5-JNC  CHAPTER 11  (Jointly Administered)
THOMAS W. WALDREP, JR., as Litigation Trustee,  Plaintiff,  v.  REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE,  Defendants.	A.P. Nos. 22-00101-5-JNC, et al.

**ORDER GRANTING CONSENT MOTION FOR WITHDRAWAL OF SPECIAL  
APPEARANCE BY ERIC JAY LANGSTON**

This matter comes before the Court upon the Motion for Withdrawal of Special Appearance by Eric Jay Langston filed on behalf of Defendants Reboot, Inc., D/B/A HIPPA A Guard, Rural Lab Outreach, LLC, and Michael Reece (“Defendants”). Defendants’ Local Civil Rule 83.1(d) Counsel will assume the lead counsel role for the Defendants. Based on the foregoing, it is:

ORDERED, AJUDGED AND DECREED that the Motion for Withdrawal of Special Appearance by Eric Jay Langston on behalf of Defendants is hereby granted and Mr. Langston's representation of Defendants in these cases is terminated.

END OF DOCUMENT